

18 July, 2016

VIA ECFS

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**REDACTED FOR PUBLIC
INSPECTION**

**Re: Request for Confidential Treatment of Filing of Dialoga Group LLC,
Applicant, for Authorization to Obtain Numbering Resources Pursuant to Section
52.15(g) of the Commission's Rules, WC Docket No. 16-_____**

Dear Ms. Dortch:

Pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, Dialoga Group LLC (hereinafter "Dialoga Group") hereby submits its application requesting authorization to obtain numbering resources.

Dialoga Group respectfully requests that, pursuant to Sections 0.457 and 0.459 of the Commission's rules, 47 C.F.R. §§ 0.457 and 0.459, the Commission withhold from public inspection and accord confidential treatment to Exhibit A-Statement to the application because that document contains commercial information that falls within Exemption 4 of the Freedom of Information Act ("FOIA")¹. Dialoga Group is voluntarily providing this information, of a kind that would not customarily be released to the public; therefore, this information is "confidential" under FOIA. Moreover, Dialoga Group would suffer competitive harm if this information were disclosed.

Exhibit A is accordingly marked with the header "SUBJECT TO REQUEST FOR CONFIDENTIAL
TREATMENT - NOT FOR PUBLIC INSPECTION"

¹ 5 U.S.C. § 552(b) (4).

In support of this request and pursuant to Section 0.459(b) of the Commission's rules², Dialoga Group hereby states as follows:

1. IDENTIFICATION OF THE SPECIFIC INFORMATION FOR WHICH CONFIDENTIAL TREATMENT IS SOUGHT³

Dialoga Group seeks confidential treatment of Exhibit A to the enclosed application.

2. DESCRIPTION OF CIRCUMSTANCES GIVING RISE TO THE SUBMISSION⁴

Dialoga Group is submitting a Exhibit A - Statement that describes Dialoga Group's Proof of Facilities Readiness as required by Section 52.15(g)(3)(i)(D) of the Commission's rules.

3. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION IS COMMERCIAL OR FINANCIAL, OR CONTAINS A TRADE SECRET OR IS PRIVILEGED⁵

The information for which Dialoga Group seeks confidential treatment contains sensitive commercial information "which would customarily be guarded from competitors"⁶. Exhibit A describes the agreement between Dialoga Group and our Carrier Partner and how this agreement supports Proof of Readiness. This description contains proprietary commercial information.

4. EXPLANATION OF THE DEGREE TO WHICH THE INFORMATION CONCERNS A SERVICE THAT IS SUBJECT TO COMPETITION⁷

Exhibit A contains information relating to commercial matters that could be used by competitors to Dialoga Group's disadvantage. Dialoga Group has numerous competitors worldwide in the Voice over Internet Protocol ("VoIP") services sector in which it operates. Detailed operations and commercial information of the type provided by Dialoga Group could compromise Dialoga Group's position in this highly competitive industry. Release would therefore result in substantial competitive harm to Dialoga Group.

² 47 C.F.R. § 0.459(b).

³ 47 C.F.R. § 0.459(b)(1).

⁴ 47 C.F.R. § 0.459(b)(2).

⁵ 47 C.F.R. § 0.459(b)(3).

⁶ 47 C.F.R. § 0.459(b)(4).

⁷ 47 C.F.R. § 0.459(b)(5).

5. EXPLANATION OF HOW DISCLOSURE OF THE INFORMATION COULD RESULT IN SUBSTANTIAL COMPETITIVE HARM⁸

Competitors could use Dialoga Group's commercial and operational information to Dialoga Group's detriment as they would gain access to information about how Dialoga Group provides services, what is Dialoga Group's strategy as well as about Dialoga Group's commercial agreements with others in the market that are not normally disclosed to the public.

6. IDENTIFICATION OF ANY MEASURES TAKEN BY THE SUBMITTING PARTY TO PREVENT UNAUTHORIZED DISCLOSURE⁹

Dialoga Group has not distributed the information in Exhibit A to the public.

7. IDENTIFICATION OF WHETHER THE INFORMATION IS AVAILABLE TO THE PUBLIC AND THE EXTENT OF ANY PREVIOUS DISCLOSURE OF THE INFORMATION TO THIRD PARTIES¹⁰

Dialoga Group has not previously disclosed in any way the information in Exhibit A.

8. JUSTIFICATION OF THE PERIOD DURING WHICH THE SUBMITTING PARTY ASSERTS THAT MATERIAL SHOULD NOT BE AVAILABLE FOR PUBLIC DISCLOSURE¹¹

Dialoga Group requests that Exhibit A be treated as confidential for a period of 15 years.

This period is necessary due to the proprietary nature of the information in Exhibit A.

⁸ 47 C.F.R. § 0.459(b)(5).

⁹ 47 C.F.R. § 0.459(b)(6).

¹⁰ 47 C.F.R. § 0.459(b)(7).

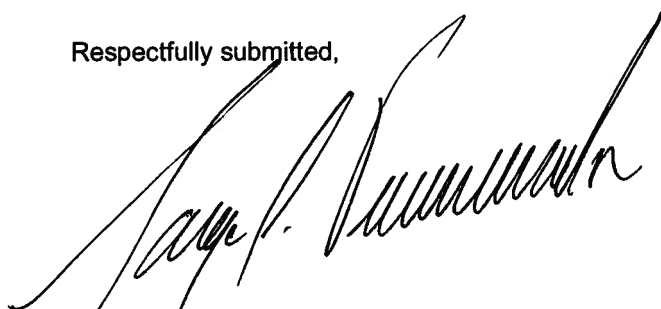
¹¹ 47 C.F.R. § 0.459(b)(8).

9. OTHER INFORMATION THAT DIALOGA GROUP BELIEVES MAY BE USEFUL IN ASSESSING WHETHER ITS REQUEST FOR CONFIDENTIALITY SHOULD BE GRANTED¹²

The information concerns Dialoga Group's proprietary network information, related to current and planned commercial and operational information, and as such, is commercially sensitive.

Should you have any questions regarding the foregoing information, please contact the undersigned at +1 646 616 7558.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Jorge Fernández', with a long, sweeping horizontal stroke at the end.

Jorge Fernández
Dialoga Group LLC
CEO

¹² 47 C.F.R. § 0.459(b)(9).

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
<i>Dialoga Group LLC</i>)	<i>WC Docket No. 16-_____</i>
For Authorization to Obtain Numbering)	
Resources Pursuant to Section 52.15(g) of the		
Commission's Rules)	

APPLICATION OF DIALOGA GROUP FOR AUTHORIZATION TO OBTAIN NUMBERING RESOURCES

Dialoga Group LLC (hereinafter, "Dialoga Group"), pursuant to Section 52.15(g)(3)(i) of the Commission's Rules, respectfully requests authorization to obtain numbering resources as described below.

As set forth in the Commission's *Numbering Order*¹, an interconnected VoIP provider may obtain numbering resources from the Numbering Administrator upon a showing that it is authorized to provide service in the area for which the numbering resources are requested. Such authorization may be obtained upon an application to the Commission containing the information detailed in Sections 52.15(g) (3)(i)(A)-(F) of the Commission's Rules. Dialoga Group hereby requests the Commission grant it that authorization.

In support of this application, Dialoga Group provides the following information:

¹ Numbering Policies for Modern Communications, *FCC 15-70 (rel. June 22, 2015)*

I. INFORMATION REQUIRED BY SECTION 52.15 (g) (3)(i)

(A) § 52.15(g)(3)(i)(A)

Name: Dialoga Group, LLC
Address: 17 State Street
New York, NY 10041
Telephone: +1 646 616 7558
Qualified Personnel: Maite Narbaiza – Regulatory Affairs

(B) § 52.15(g) (3) (i)(B)

Dialoga Group hereby acknowledges that authorization to obtain numbering resources under Section 52.15(g) of the Commission's Rules is subject to compliance with applicable Commission numbering rules as well as to the numbering authority delegated to the states. Dialoga Group hereby also acknowledges that this authorization is subject to compliance with industry guidelines and practices and regulation regarding numbering, just as to telecommunications carriers.

(C) § 52.15(g) (3) (i)(C)

Dialoga Group hereby acknowledges that it must file requests for numbers with the relevant state commission(s) at least 30 days before requesting numbers from the Numbering Administrators.

(D) § 52.15(g) (3) (i)(D)

Dialoga Group hereby sets forth its capability to provide service within 60 days of the numbering resources activation date.

Dialoga Group has an agreement in place with its Carrier partner for routing to ILECs.

Dialoga Group is a telecommunications operator active in several European countries such as the United Kingdom, France, Germany and Spain where Dialoga Group has extensive experience managing the portability systems on its own.

Dialoga Group has developed porting tools to enable carriers to submit porting requests and has accomplished bulk ports with no difficulty. Dialoga Group already has in place the necessary procedures to enable it to place numbers into service within 60 days of activation. Under its current agreements and established procedures, Dialoga Group will be able to place nearly all numbers into service within similar timeframe, and all numbers will be placed into service within 60 days of activation.

As proof of its facilities readiness, Dialoga Group has attached a statement describing the agreement between Dialoga Group and its carrier partner providing that the carrier partner will host Dialoga Group numbers on its switches and provide PSTN connectivity for inbound calls to Dialoga Group numbers. This "Statement" is attached.

(E) § 52.15(g) (3) (i)(E)

Dialoga Group hereby certifies that it complies with its Universal Service Fund contribution obligations under 47 CFR part 54, subpart H, its Telecommunications Relay Service contribution obligations under 47 CFR § 64.604(c)(5)(iii), its North American Numbering Plan and Local Number Portability Administration contribution obligations under 47 CFR §§ 52.17, 52.32, its obligations to pay regulatory fees under 47 CFR § 1.1154, and its 911 obligations under 47 CFR part 9.

(F) § 52.15(g) (3) (i) (F)

Dialoga Group hereby certifies that it has consolidated managerial and technical expertise to provide reliable service, on the other hand we have solid financial basis to support the project.

Dialoga Group has the capabilities to seamlessly place numbers into service, successfully port and route calls without impact to terminating inter-carrier compensation for originating calls.

Dialoga Group's lengthy experience with number porting in several countries enables it, along with its carrier partners, to create routing arrangements that seamlessly deliver calls to numbers directly assigned to Dialoga Group.

Dialoga Group's key personnel are listed below, additionally Dialoga Group has a large group of telecommunications engineers and other technical experts as well as an experienced management team. None of the personnel are being or have been investigated by the Commission or any law enforcement or regulatory agency for failure to comply with any law, rule, or order.

Key Personnel: Jorge Fernandez, Chief Executive Officer (Telecommunications engineer)
Asier de Felipe, Chief Operating Officer (Telecommunications engineer)
Nicholas Monty, Chief Financial Officer
Maite Narbaiza, Regulatory Affairs

(G) § 52.15(g) (3) (i) (G)

Dialoga Group hereby certifies that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862.

II. ACKNOWLEDGMENT OF CONDITIONS IN SECTION 52.15 (G) (3) (IV).

As required by Section 52.15(g) (3) (iv), Dialoga Group will maintain the accuracy of all contact information and certifications in this application, and will file a correction with the Commission and each applicable state within 30 days of any changes. Dialoga Group will also provide accurate regulatory and numbering contact information to each state commission when requesting numbers in that state.

III. CONCLUSION

Pursuant to Section 52.15(g) (3) (i) of the Commissions' Rules, Dialoga Group respectfully requests the Commission grant this application for authorization to obtain numbering resources.

Respectfully submitted,

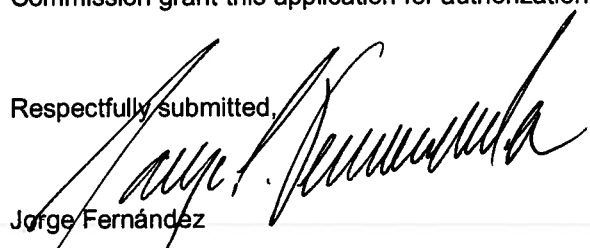

Jorge Fernández
Dialoga Group LLC
CEO

Exhibit A: "SUBJECT TO REQUEST FOR CONFIDENTIAL TREATMENT – NOT FOR PUBLIC INSPECTION".

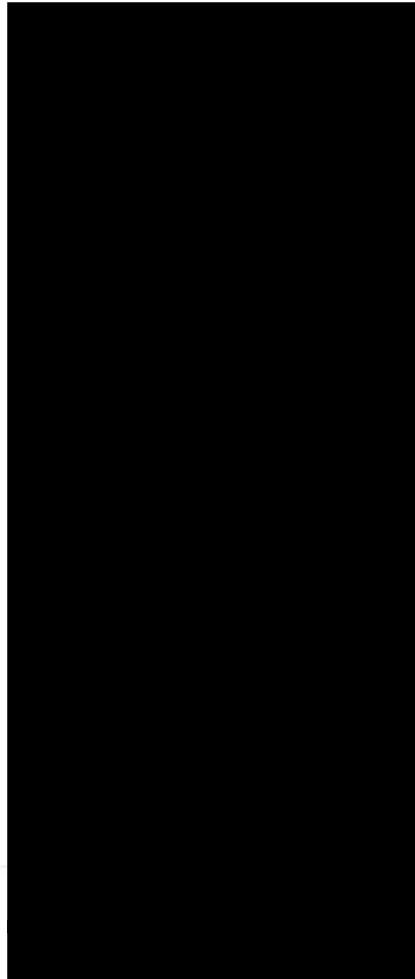
Dialoga Group LLC

Proof of Facilities Readiness 52.15 (G) (2) Statement

Dialoga Group is an Interconnected VoIP Provider based in New York City that shall provide non-facilities based services.

Dialoga Group is certified to do business in the United States.

After receipt of numbering authorization, **Dialoga Group** intends to request numbers over time in at least the following states:



We shall offer local voice and long distance and VoIP services.

Dialoga Group is able to provide VoIP services to its end-users because we have successfully deployed the necessary tools (API), terms and conditions, have established a Host service agreement.

Dialoga Group will upon the receipt of direct access to numbering resources

- Provide VoIP services to its customers within 60 days using our existing equipment,
- Certify that the number resources are being used,
- Use numbering resources efficiently according to the applicable regulation,
- Comply with all of the existing number rules,
- Submit the NRUF on a semi-annual basis, participate in number pooling and comply with all the number portability requirements,
- Comply with all of the regulatory mechanisms that are applicable to telecommunications carriers to ensure compliance with the FCC as well as the states numbering resource optimization procedures